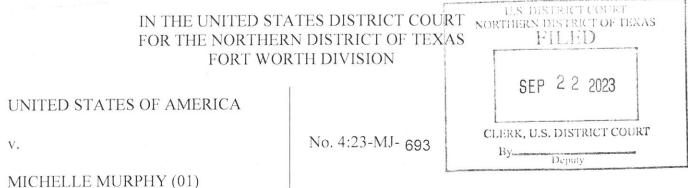
ORIGINAL



CRIMINAL COMPLAINT

I, Christopher Rodriguez, a Special Agent with Homeland Security Investigations, being duly sworn, state the following is true and correct to the best of my knowledge and belief, but are not inclusive of all the evidence or information in the case:

Offense:

On or about July 28, 2023, in the Fort Worth Division of the Northern District of Texas and elsewhere, defendant **Michelle Murphy** used and caused to be used a facility of interstate and foreign commerce, with intent that the murder of Intended Victim-1 be committed in violation of the laws of the state of Texas, as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of pecuniary value, namely, Bitcoin, in violation of 18 U.S.C § 1958.

Agent Background:

1. I am Special Agent with the Department of Homeland Security, Homeland Security Investigations (HSI), and have been since January 2010. I am currently assigned to the Cyber Crimes group in Dallas, Texas. Prior to my employment with HSI, I obtained my Bachelor of Science and Master of Science in Criminal Justice from Florida International University in Miami, Florida. As a Special Agent, I am responsible for investigating violations of federal statutes relating to Immigration and Customs Enforcement including narcotics smuggling, computer technology, and financial crimes. I Complaint – Page 1

have led or been directly involved in a variety of investigations involving complex white-collar fraud and other federal violations. In the course of those investigations, I have utilized undercover operations, confidential informants, operated pen registers, and secure other relevant information using various investigative techniques that have led to conviction of individuals involved in criminal conduct. I have also conducted and participated in physical surveillance and execute search warrants.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

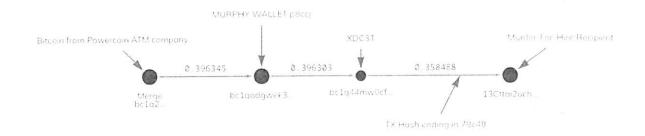
Probable Cause:

- 3. In August 2023, HSI received information from a source that an unknown suspect on the dark web sought to have Intended Victim-1, who lives in the Northern District of Texas, murdered in exchange for money. To pay for the murder, on or about July 28, 2023, the suspect sent approximately \$10,510 (0.358488 BTC) in bitcoin from a digital wallet address ending in XDC3T utilizing a transaction hash ending in 78c48. The source also gave a possible name and address for Intended Victim-1 and said that the dark web suspect who sought to have Intended Victim-1 murdered used the moniker "LISTMUDI."
- 4. Based on this information, I conducted blockchain analysis on the Bitcoin blockchain and found several transactions associated with the murder-for-hire transaction. As described in more detail below, through my analysis I discovered that on Complaint Page 2

July 26 and 27, 2023, **Murphy** converted cash into Bitcoin at a cryptocurrency ATM, depositing the Bitcoin into a cryptocurrency wallet identified by a unique digital address ending in p8ccj. Then on July 28, 2023, **Murphy** used Bitcoin traceable to wallet p8ccj to pay a person to murder Intended Victim-1.

- 5. Powercoin, LLC ("Powercoin") is a company that operates cryptocurrency ATMs. Powercoin allows users to deposit and convert fiat currency into cryptocurrency. Powercoin requires the depositor to provide identification information, and the ATMs also take a video/photo of the individual.
- 6. Based on information received from Powercoin, including photographs taken at a cryptocurrency ATM in Bedford, Texas, I found that **Murphy** made the following transactions using her Texas Driver's License as identification and listing her residence in Bedford:
 - a. On July 26, 2023, at approximately 5:58pm, Murphy deposited \$3,000 in cash. The crypto-ATM charged a fee of \$405 and deposited \$2,595 worth of bitcoin into Murphy's wallet address ending in p8ccj.
 - b. On July 26, 2023, at approximately 6:04 p.m., **Murphy** deposited \$8,700 in cash. The crypto-ATM charged a fee of \$1,174.50 and deposited \$7,525.50 worth of bitcoin into **Murphy**'s wallet address ending in p8ccj.
 - c. On July 27, 2023, at approximately 5:05 p.m., **Murphy** deposited \$3,000 in cash. The crypto-ATM charged a fee of \$405 and deposited \$2,595 worth of bitcoin into **Murphy**'s wallet address ending in p8ccj.

7. Blockchain analysis showed the wallet ending in p8ccj sent a single transaction containing approximately \$10,550 (0.396303 Bitcoin) to a wallet ending in XDC3T on or about July 27, 2023. The Bitcoin wallet containing address XDC3T then sent approximately \$10,510 (0.358488 BTC) in a transaction with a hash value ending in 78c48 to what the source said was the intended murder-for-hire recipient. These transactions are summarized in the following graph:



- 8. Based on this tracing, there is probable cause that **Murphy** converted cash into Bitcoin and then used that Bitcoin to hire someone to murder Intended Victim-1.
- 9. On August 11, 2023, I spoke to Intended Victim-1, who told me that she was currently in a romantic relationship with a man with initials O.G., whom HSI agents were able to positively identify. Intended Victim-1 said that O.G. lives at an address in Bedford, Texas with another girlfriend named "Michelle." Intended Victim-1 also said that "Michelle" had recently made over \$100,000 selling her previous home in Colorado.
- 10. I found what I believe to be **Murphy's** publicly accessible Facebook page, which lists her as "In a relationship" with O.G. I also noticed on **Murphy's** Facebook page that **Murphy** had several photographs of a dog that appears to be a "Mudi" breed. The person who attempted to hire a hitman to murder Intended Victim-1 used a dark web

moniker "LISTMUDI," further linking Murphy to the murder-for-hire.

- 11. Records for **Murphy**, obtained through Texas state databases, show an active address in Bedford, Texas.
- 12. On September 21, 2023, agents saw O.G. and **Murphy** at the DFW Airport. Both O.G. and **Murphy** were escorted to a TSA office to conduct an interview and execute a search warrant of **Murphy** and her personal property. In the Mirandized interview, **Murphy** acknowledged that she found out that O.G. was seeing another woman, Intended Victim-1. **Murphy** then admitted she transferred Bitcoin with the intent to pay a person to murder Intended Victim-1.

CONCLUSION

13. I believe that the above-stated facts establish probable cause that the Michelle Murphy has violated 18 U.S.C. § 1958, that is, the use of interstate commerce facilities in the commission of murder-for-hire.

Respectfully submitted,

Christopher Rodriguez, Special Agent Homeland Security Investigations

Sworn to me, over the telephone or other electronic means, and signed by me pursuant to Fed.R.Crim.P. 4.1 on this 22nd day of September, 2023 at 31 5 p.m. in Fort Worth, Texas.

JEFFBEN L. CURETON

UNITED STATES MAGISTRATE JUDGE